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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

14 ROBERT ROMERO, an individual,  
15 Plaintiff,  
16 v.  
17 GE BETZ, INC.; DOES 1 through 50,  
18 inclusive,  
19 Defendants.  
20

Case No. 2:16-cv-01356-FMO-JCx

**DEFENDANT GE BETZ, INC.'S  
NOTICE OF MOTION AND  
MOTION TO COMPEL  
ARBITRATION**

Hearing Date: June 16, 2016  
Time: 10:00 a.m.  
Courtroom: 22 – 5<sup>th</sup> Floor  
Judge: Hon. Fernando M. Olguin

Complaint Filed: January 25, 2016  
Trial Date: April 11, 2017

**TO PLAINTIFF ROBERT ROMERO AND HIS ATTORNEYS OF RECORD:**

NOTICE IS HEREBY GIVEN that on June 16, 2016 at 10:00 a.m. or as soon thereafter as the matter may be heard, before the Honorable Judge Fernando M. Olguin in Courtroom 22 of the above-entitled Court, located at 312 N. Spring Street, Los Angeles, CA 90012, Defendant GE Betz, Inc. ("Defendant") will and hereby does move pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 1, *et seq.*, as follows:

(1) For an Order pursuant to 9 U.S.C. § 4, compelling Plaintiff Robert Romero ("Plaintiff") to submit his claims to arbitration in conformance with Defendant's Solutions Alternative Dispute Resolution Procedure applicable to its California employees, which requires the claims to be resolved by final and binding arbitration, and dismissing Plaintiff's Complaint.

This Motion is based upon this Notice, the accompanying Memorandum of Points and Authorities in support thereof, the Declaration of Jennifer Kozak and exhibits thereto, the declaration of Rachel J. Moroski, the proposed order filed herewith, all papers and pleadings filed in this action, and any other evidence and argument as may be presented at or prior to the hearing on the Motion.

This Motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on March 16, 2016.

DATED: May 10, 2016

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Rachel J. Moroski  
MICHAEL N. WESTHEIMER  
RACHEL J. MOROSKI

Attorneys for Defendant  
GE BETZ, INC.

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